

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

x

UNITED STATES OF AMERICA,

Plaintiff,

CV 13-3349

- against-

(DLI) (JO)

FOUR HUNDRED THIRTY –FOUR THOUSAND SIX
HUNDRED SIXTEEN DOLLARS AND FIFTY-FIVE
CENTS (\$ 434,416.55) FORMERLY ON DEPOSIT
IN FIRST TRADE SECURITIES, INC., ACCOUNT
NUMBER 882-17331-13 FORMERLY HELD IN THE
NAME OF YA-JU HSU, AND ALL PROCEEDS
TRACEABLE THERETO, and

VERIFIED ANSWER TO
CIVIL COMPLAINT FOR
FORFEITURE IN REM

THE REAL PROPERTY AND PREMISES LOCATED
AT 82-34 TRYON PLACE, JAMAICA ESTATES, NEW
YORK 11432.

x

VERIFIED ANSWER TO COMPLAINT FOR FORFEITURE IN REM

Claimant STEVEN CHUN-YU CHANG, by and through his undersigned
counsel, hereby files his Answer and Affirmative Defenses to the Plaintiff's
Civil Complaint For Forfeiture In Rem and says:

1. Claimant admits the allegations contained in paragraphs 1; 2;3; 4;5;6;7;11,
12 (except denies as to reference to “ fraudulent activity ”); 13; (except
denies as to “ involvement in fraudulent activity ”); 14; 15; 16; 17; and 49.
2. Claimant, as to the allegations contained in paragraphs 8;9;10;18 through 47
and 49 through 66, is without sufficient knowledge to form a belief as to the
truth of the allegations contained therein and therefore denies all allegations
contained therein.

AFFIRMATIVE DEFENSES

FIRST AFFIRMATIVE DEFENSE

Cecilia Chang acted in good faith at all times relevant to the Complaint.

SECOND AFFIRMATIVE DEFENSE

The allegations contained in the Complaint are compound, vague and ambiguous.

THIRD AFFIRMATIVE DEFENSE

Claimant is an innocent heir to the property in question and did not know, or have reason to know that the property in question was related to criminal activity.

FOURTH AFFIRMATIVE DEFENSE

The government cannot obtain the forfeiture judgment it seeks because the result would be constitutionally disproportionate.

RESERVATION OF RIGHTS

Claimant reserves the right to assert additional affirmative defenses or amend these affirmative defenses as discovery warrants.

CLAIMANT'S DEMAND FOR JURY TRIAL

Claimant hereby demands a trial by jury of all issues so triable.

Respectfully Submitted,

Mahler & Harris, P.C.

Attorneys for Claimant

By:

A handwritten signature in dark ink, appearing to read "Stephen R. Mahler", is written over a horizontal line.

Stephen R. Mahler, Esq.

Bar No.

125-10 Queens Boulevard

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Kew Gardens, N.Y. 11415

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Fax; 718- 263-0134

Email" mhe311@aol.com

VERIFICATION

Steven Chun-Yu Chang, an attorney duly licensed to practice law
before the courts of the State of Hawaii, affirms the truth of the following under the
penalties of perjury:

That I have read the within Verified Answer to the Verified
Complaint in Rem that has been filed by the government and know the contents
thereof.

That I believe that the statements contained in the within Verified
Answer are true to the best of my knowledge, information and belief, and where
statements are made therein upon information and belief, I believe them to be true to the
best of my knowledge, information and belief.

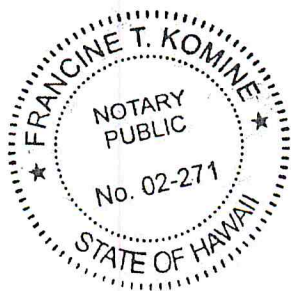

Steven Chun-Yu Chang

State of Hawaii)

:ss.:

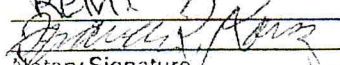
County of Honolulu)

On the 30th day of July, 2013
before me came Steven Chun-Yu Chang
who is personally known to me and who
signed this document in my presence.




Notary Public FRANCINE T. KOMINE

My commission expires June 9, 2014

Doc. Date: JUL 30 2013 # Pages: 4
Notary Name: F. Komine 1st Circuit
Doc. Description: Verified Answer
to Complaint For Forfeiture
REM
 JUL 30 2013
Notary Signature Date
NOTARY CERTIFICATION

